

Natalia motion to modify plan

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	<b>CASE NO. 14-20014 TPA</b>
	)	
<b>NATALIA V. ZAVODCHIKOV,</b>	)	<b>CHAPTER 11</b>
	)	<b>DOCKET NO.</b>
<b>DEBTOR.</b>	)	<b>RELATED TO DOC. NO. 82</b>

**MOTION TO MODIFY PLAN OF REORGANIZATION**

NOW COMES, Natalia V. Zavodchikov, debtor in the above referenced case (“Debtor”), hereby moves to modify the Amended Plan of Reorganization filed by the Debtor on November 22, 2014 (“Plan”), to correct a drafting error and resulting conflict of terms, and in support thereof, represents as follows:

1. The introductory paragraph in paragraph 6.07 of the Plan provides in part as follows (“Introductory Paragraph”):

**CLASS 8** - The Class 8 education loan claims held by the **U. S. Department of Education** shall be paid in full with interest at a rate of 3.5% per annum in one hundred ninety two (192) equal monthly payments in the amount of \$1,390.00 beginning on the Plan Effective Date.

2. Class 8 claims total \$240,498. The Introductory Paragraph should have stated that the number of payments was two hundred forty one (241) , not one hundred ninety two (192). To amortize \$240,498 at \$1,390 per month with interest at 3.5%, 241 months in required.

3. The correct payment terms were stated in the Summary of the Plan and the Disclosure Statement but not in the Plan.

4. The Debtor desires to modify the Plan to correct the drafting error in the Introductory Paragraph to state as follows:

**CLASS 8** - The Class 8 education loan claims held by the **U. S. Department of Education** shall be paid in full with interest at a rate of 3.5% per annum in two hundred forty one (241) equal monthly payments in the amount of \$1,390.00 beginning on the Plan Effective Date.

WHEREFORE, the Debtor prays your Honorable Court to enter an order modifying the Introductory Paragraph as set for in paragraph 4 above, and to grant the Debtor such other and further relief as is just.

/s/ Gary W. Short

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